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*Proposed Attorneys for Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EXTENDING
TIME TO RESPOND TO MOTIONS TO
BE HEARD ON MARCH 12 AND 13, 2019**

[No Hearing Requested]

1 This stipulation and agreement for order (“Stipulation and Agreement for Order”) is
2 entered into by PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric Company (the
3 “Utility”), as debtors and debtors in possession (collectively, the “Debtors”), on the one hand,
4 and the Official Committee of Unsecured Creditors (the “Creditors Committee”) on the other.
5 The Debtors and the Creditors Committee are referred to in this Stipulation and Agreement for
6 Order collectively as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree
7 as follows:

8 **RECITALS**

9 A. On February 6, 2019, the Debtors filed a notice of hearing (the “Notice”)
10 [Dkt. 353] noticing sixteen (16) motions listed therein for a hearing before the Court at 9:30 a.m.
11 on February 27, 2019. At the February 27 hearing, four (4) motions, identified in the Notice as
12 the Cash Management Motion [Dkt. 7], the Customer Programs Motion [Dkt. 16], the
13 Operational Integrity Suppliers Motion [Dkt. 12], and the DIP Financing Motion [Dkt. 23]
14 (collectively, the “Motions”), were adjourned to hearings set for March 12, 2019 (as to the
15 Customer Programs Motion) and March 13, 2019 (as to the other three Motions).

16 B. Pursuant to the *Amended Notice of Agenda for February 27, 2019 9:30 a.m.*
17 *Omnibus Hearing*, filed by the Debtors on February 26, 2019 [Dkt. 668], the Creditors
18 Committee and the Debtors agreed, and at the February 27 hearing, the Court authorized, that the
19 time for the Creditors Committee to respond to the Motions be extended to 4:00 p.m. (Pacific
20 Time) on March 5, 2019.

21 C. Proposed counsel for the Creditors Committee has requested, and proposed
22 counsel for the Debtors has agreed, that the time for the Creditors Committee to respond to the
23 Motions be further extended.

24 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
25 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
26 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
27 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
28 **THAT:**

1 1. The time for the Creditors Committee to file and serve any response or
2 opposition to the Motions is extended through 4:00 p.m. (Pacific Time) on March 8, 2019.

3 Dated: March 4, 2019

Dated: March 4, 2019

4 KELLER & BENVENUTTI LLP

MILBANK LLP

5
6 /s/ Jane Kim

Jane Kim

/s/ Thomas R. Kreller

Thomas R. Kreller

7 *Proposed Attorneys for Debtors*
8 *and Debtors in Possession*

Proposed Attorneys for Official Committee
of Unsecured Creditors